1	Kevin P. Rooney, #107554 Of Counsel, HAMMERSCHMIDT LAW CORPORATION	
2	2445 Capitol Street, Suite 215 Fresno, CA 93721	
3	Tel: (559) 233-5333 Fax: (559) 233-4333	
4	Attorney for Defendant, MICHAEL VANDEVENTER	
5		
6	IN THE UNITED STATES DISTRICT COURT FOR THE	
7	EASTERN DISTRICT OF CALIFORNIA	
8		
9	UNITED STATES OF AMERICA,	Case No.: 1:20-cr-00206
10	Plaintiff,) JOINT MOTION TO EXONERATE BOND) AND ALL SECURITY PLEDGED IN THS
11	vs.	CASE; ORDER THEREON
12	MICHAEL VANDEVENTER,	
13	Defendant.	
14		
15		
16	Defendant MICHAEL VANDEVENTER, b	y and through his Attorney of Record, KEVIN P.
17	ROONEY, hereby requests this Court exonerate the security which formerly secured the	
18	appearance of Mr. Vandeventer during his pre-trial release and post-sentencing. The United	
19	States joins in this motion.	
20	A secured bond of \$10,000 was posted by Mr. Vandeventer and his third-party custodian,	
21	Daniel Saenz, on November 30, 2020. Mr. Vandeventer was released from custody with release	
22	conditions. A Change of Plea Hearing was held December 12, 2022, and Mr. Vandeventer	
23	entered a guilty plea. On January 16, 2024, Mr. Vandeventer was sentenced by the Honorable	
24	Charles R. Breyer.	
25	Mr. Vandeventer has reported to serve his se	entence and is in BOP custody according to the
26	BOP inmate locator website.	
27		

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1	Mr. Vandeventer respectfully requests the	he Court exonerate the secured bond of \$10,000,
2	corresponding to the pink slips received by the Court on December 10, 2020 for a 1994 Toyota,	
3	CA LP# 3GTY959, VIN# 362300 and on December 16, 2020 for a 2006 Mercedes, CA LP#	
4	7BAU025, VIN# WDBUF70J36A867735 and a 1999 Dodge Durango, VIN#	
5	1B4HS28Y3XF520202, No NV License Plate No. listed, which formerly secured Mr.	
6	Vandeventer's appearance in Case No. 1:20-cr-00206-CRB-BAM-1.	
7 8	Dated: May 9, 2024	/s/ Kevin Rooney Kevin P. Rooney Attorney for Defendant,
9		Michael Vandeventer
10	Dated: May 9, 2024	PHILLIP A. TALBERT,
11		United States Attorney
12		<u>s/ Justin Gilio</u> Justin Gilio
13		Assistant United States Attorney
14	ODDED	
17		ODDED
15	<u>'</u>	<u>ORDER</u>
		ORDER equest for the Court to exonerate all security pledged
15	IT IS ORDERED THAT the above re	
15 16	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for
15 16 17	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the pink sl	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for the 1994 Toyota, CA LP# 3GTY959, VIN# 362300;
15 16 17 18	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VIN	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for the 1994 Toyota, CA LP# 3GTY959, VIN# 362300; N# WDBUF70J36A867735 and 1999 Dodge
15 16 17 18 19	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VIN	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for the 1994 Toyota, CA LP# 3GTY959, VIN# 362300;
15 16 17 18 19 20	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VINDurango, VIN# 1B4HS28Y3XF520202, No	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for the 1994 Toyota, CA LP# 3GTY959, VIN# 362300; N# WDBUF70J36A867735 and 1999 Dodge
15 16 17 18 19 20 21	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VINDurango, VIN# 1B4HS28Y3XF520202, No	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for he 1994 Toyota, CA LP# 3GTY959, VIN# 362300; N# WDBUF70J36A867735 and 1999 Dodge NV License Plate No. listed, which formerly ase No. 1:20-cr-00206-CRB-BAM-1, is hereby
15 16 17 18 19 20 21 22	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VINDurango, VIN# 1B4HS28Y3XF520202, No secured Mr. Vandeventer's appearance in Case	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for he 1994 Toyota, CA LP# 3GTY959, VIN# 362300; N# WDBUF70J36A867735 and 1999 Dodge NV License Plate No. listed, which formerly ase No. 1:20-cr-00206-CRB-BAM-1, is hereby
15 16 17 18 19 20 21 22 23	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VINDurango, VIN# 1B4HS28Y3XF520202, No secured Mr. Vandeventer's appearance in Case granted; and all security in this case is exone	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for he 1994 Toyota, CA LP# 3GTY959, VIN# 362300; N# WDBUF70J36A867735 and 1999 Dodge NV License Plate No. listed, which formerly ase No. 1:20-cr-00206-CRB-BAM-1, is hereby
15 16 17 18 19 20 21 22 23 24	IT IS ORDERED THAT the above results on behalf of Michael Vandeventer in this case \$10,000, corresponding to the pink slips of the 2006 Mercedes, CA LP# 7BAU025, VINDurango, VIN# 1B4HS28Y3XF520202, No secured Mr. Vandeventer's appearance in Case	equest for the Court to exonerate all security pledged se, more specifically the secured property bond for he 1994 Toyota, CA LP# 3GTY959, VIN# 362300; N# WDBUF70J36A867735 and 1999 Dodge NV License Plate No. listed, which formerly ase No. 1:20-cr-00206-CRB-BAM-1, is hereby